

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEITLIN, YOUNGMAN, KARAS  
& GERSON, LLC  
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In Re:

ELIZABETH SUAREZ,

Debtor.

Case No.: 11-33438-NLW

Judge: Hon. Novalyn L. Winfield

Chapter: 13

**APPLICATION FOR ORDER SHORTENING  
TIME PERIOD FOR NOTICE UNDER FED. R. BANKR. P. 9006(c)(1)**

The application of Donna Calabrese respectfully represents:

1. I am the landowner for the premises that the debtor resides in.
2. Debtor is using the Bankruptcy Court to forestall her eviction from the premises at the eleventh hour.
3. The debtor has not paid use and occupancy charges since March, 2011.
4. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006 (c)(2) and the rules listed therein.
5. The debtor filed a Chapter 13 Bankruptcy action on July 15, 2011 under Case No. 11-31331-NLW.
6. The landowner, Donna Calabrese, filed a Motion to Vacate Stay on Short Notice which was returnable on August 15, 2011 at 11:00 a.m. before the Honorable Novalyn L. Winfield.
7. In the interim, on August 3, 2011, the Court dismissed debtor's Petition for failure

to file missing documents, at which time as the landowner renewed its request for eviction.

8. On August 4, 2011, the debtor filed a second Chapter 13 Petition under 11-33438-NLW in violation of the Bankruptcy rules.

9. The landowner, Donna Calabrese, renews her request to vacate the automatic stay.

10. The landowner, Donna Calabrese, respectfully requests that the Court hear this Motion on Short Notice on the date previously scheduled in connection with Ms. Suarez's prior Chapter 13 Case which was scheduled to be heard on August 15, 2011 at 11:00 a.m. before the Honorable Novalyn L. Winfield.

WHEREFORE, applicant requests entry of the order submitted herewith.

By: /s/ Kathy Karas-Pascuicco  
Kathy Karas-Pascuicco, Attorney for  
Applicant, Donna Calabrese

Dated: August 10, 2011